

RECEIVED

AUG 14 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

)
Amendment of Section 73.682(a)(21)(iv))
of the Commission's Rules To Permit)
The Transmission of Ghost Canceling)
Reference Signals on Line 19 of NTSC)
Color Television Transmissions.)

RM -

ORIGINAL
FILE

Petition for Rule Making

Pursuant to Section 1.401 of the Commission's Rules, the United States Advanced Television Systems Committee ("ATSC")¹ asks the Commission to amend Section 73.682(a)(21)(iv) of its Rules to restrict the kind of signal that can be placed on Line 19 of the vertical blanking interval of NTSC color television transmissions to the Ghost Canceling Reference signal standardized by ATSC ("ATSC GCR signal") and included as Attachment A.

The reasons for our request are described fully below.

I. Introduction.

Section 73.682(a)(21)(iv) of the Commission's Rules specifically reserves Line 19 of the NTSC television system vertical blanking interval for the transmission of a Vertical Interval Reference signal ("VIR signal") and precludes transmission of alternative or different

¹ATSC is a private-sector organization whose charter and terms of reference provide for the voluntary standardization of advanced television technologies. The membership of ATSC is broadly constituted among the industries most affected by advanced television: broadcasting, cable, satellite, manufacturing, and motion picture production. A complete list of member companies and organizations is included as Attachment B.

signals.² Because the VIR signal no longer serves the purposes for which it was developed, reservation of Line 19 for the VIR signal is unnecessary. At the same time, Line 19 is an optimal choice for the transmission of the ATSC GCR signal.

The ATSC has completed a standardization process that has culminated in the development of a single technical standard for ghost canceling service. ATSC believes that its standard will have maximum likelihood of being implemented by the broadcast, cable, and consumer electronics industries if the Commission protects the use of Line 19 for the transmission of the ATSC GCR signal. In order to encourage manufacturers, and to assure the compatibility of ghost canceling encoders and decoders, ATSC strongly urges the Commission to reserve the use of Line 19 exclusively for transmission of the ATSC GCR signal standard.

II. The Commission Should Begin a Rulemaking Proceeding Proposing to Adopt the ATSC GCR standard for Line 19.

In order for broadcasters, cable companies, and consumer electronics manufacturers to cooperatively bring ghost canceling service to American television viewers, Commission regulatory approval is necessary in light of the industry's clear preference to use Line 19. The VIR signal now specified in the Commission's Rules simply no longer serves the purposes for which it was intended. Consumer electronics manufacturers are not currently using the Line 19 VIR signal. ATSC can conceive of no possible reason why the existing Line 19 regulations should NOT be changed to permit transmission of standardized ghost canceling service. The Commission should begin rulemaking as soon as possible.

²Specifically, the Commission's Rules provide that "line 19, in each field, may be used only for the transmission of the reference signal described in Figure 16 of § 73.699." 47 CFR § 73.682(a)(21)(iv) (1991). The VIR signal transmission requirement was adopted by the Commission on November 12, 1974.

A. The VIR Signal no longer serves the purposes for which it was intended.

Television receivers being manufactured today do not have VIR signal circuitry and, as discussed further below, there are very few receivers in the hands of consumers that contain VIR capability. Accordingly, no compelling reason exists for the FCC to strictly maintain the Section 73.682(a)(21)(iv) regulatory requirement that constrains use of Line 19 to the transmission of VIR signals. The public interest would be better served if Line 19 became available exclusively for transmission of the ATSC GCR signal.

Section 73.682(a)(21)(iv)'s VIR signal requirement was designed to promote greater uniformity and consistency of color television reception.³ Although the VIR signal potentially could have improved color television reception, for a variety of reasons discussed below, that potential was not realized. A far better improvement to NTSC service would be the use of ghost canceling technology. Ghost canceling, when implemented, is an attractive new feature that will generate a significant improvement in consumer color television reception. Similarly, the use of ghost cancelers at cable television "head-ends" could improve their customers' reception of broadcast television signals.

As television broadcasters and the viewing public made the transition from monochrome to color, significant variation in color characteristics (observed on home television receivers from program to program and from station to station) became

³See Report and Order, Docket No. 19907, adopted November 12, 1974, released November 20, 1974, FCC 74-1234, 49 FCC 2d 884, 31 RR2d (P&F) 1505.

increasingly evident. Most color television receivers used the color burst amplitude as a reference that enabled control of the chrominance channel gain using the receiver's automatic chrominance circuits. However, the color burst amplitude varied enough to make such a reference almost useless.⁴ Also, the original program reference burst phase was not retained by many broadcasters. To remedy these difficulties, the VIR signal was devised as a means to reduce undesired variations in color throughout the television system by providing a more precise reference signal. In theory, the VIR signal would have enabled television producers, broadcasters, and the automatic color correction circuits in home receivers to adjust signal parameters in such a way as to restore the original program's color, notwithstanding distortions or artifacts that may have been introduced into the television system prior to color correction.⁵

Unfortunately, however, effective implementation of the VIR signal did not occur to the extent that cognizable VIR signal benefits were provided to consumers. Primarily due to the advances made in the chroma circuitry processing of the color burst signal, circuitry to maximize the potential benefits of the VIR signal was not widely implemented by the receiver manufacturing industry. Only one manufacturer, General Electric, actually produced any significant quantity of VIR equipped receivers, and production of these receivers ceased in

⁴The FCC's specifications for NTSC color transmission permitted up to an 8.4 dB variance between the burst amplitude and the resulting chrominance gain. See, e.g., Loughlin, B.D., The VIR Signal and its Status, Proceedings of the 28th Annual Broadcast Engineering Conference, National Association of Broadcasters (1974) at 25.

⁵See EIA Recommended Practice for Use of a Vertical Interval Reference (VIR) Signal, EIA Television Systems Bulletin No. 1, EIA Engineering Department (July, 1972).

1985. ATSC believes the number of these receivers that now exist in the hands of consumers is very small. Tests performed during the course of ATSC's work indicate that receivers with VIR circuitry are not adversely affected by the presence of a GCR signal on Line 19.⁶ Moreover, the few VIR receivers remaining in the market are capable of operation using the color burst signal in the absence of the VIR signal. No receivers manufactured today use the presence of the VIR signal to maintain consistent color rendition, and ATSC is not aware of any plans to begin manufacturing of VIR receivers.⁷ Also, the implementation of the VIR signal by broadcast stations and networks was such that it could not be adequately relied upon to provide a standard reference for a VIR receiver. For the VIR signal to be maximally effective for the consumer, the VIR signal must be added at the time the program is originally created and must remain unchanged during distribution of that program. It was difficult for television stations to consistently apply the VIR signal given the complexities of program production and distribution. And, a mis-applied VIR signal could actually change

⁶The Public Broadcasting Service (PBS) conducted tests to determine the effect on VIR receivers of four candidate ATSC GCR signals placed on line 19. Two General Electric VIR receivers were tested. PBS concluded:

"The test result indicated that the receivers tested did not recognize [the ATSC GCR signal]. Therefore, the receivers acted as if there was no VIR signal present; The VIR indicator LEDs were off and manual adjustments could be used to set proper color, tint and brightness even [if] the VIR function was turned on."

Public Broadcasting Service, VBI Utilization Tests of Ghost Canceling Systems (hereinafter "PBS VBI Tests"), ATSC Document No. T3/204, Section 6.7 (May, 1992).

⁷As can be seen from Attachment B, virtually all major manufacturers of television receivers are members of ATSC and participated in the ghost-canceling standardization activities of ATSC.

the consumer's received color rendition for the worse. A ghost canceling signal, in contrast, needs to be added only once -- at the point of over-the-air transmission.

Based on these factors -- no manufacturing, and insufficient implementation -- ATSC believes there is no compelling reason to maintain a reservation of Line 19 for the transmission of the VIR signal by television stations.

B. The Commission Should Encourage Standardized Implementation of the ATSC GCR Signal.

At the request of the National Association of Broadcasters (NAB), the ATSC has successfully developed and agreed to a single technical standard for a ghost canceling reference signal.⁸ GCR technology was conceived and originally discussed well over a decade ago.⁹ Today, with the advent of smaller, faster and less expensive digital devices, it is now possible to develop ghost canceling decoders at costs that suggest a consumer and professional market may develop rapidly for ghost canceling decoders both in the head-ends of cable television systems as well as in consumer television receivers.

⁸The broadcasting industry strongly supports a ghost canceling technical standard. In 1990, NAB surveyed television station chief engineers on the importance of a ghost canceling technical standard. Almost half (47%) of the respondents rated a ghost canceling standard as Very Important and another 40% responded rated ghost canceling as Somewhat Important. See Memo from ATSC T3/S5 VBI Study Group, ATSC Document No. T3S5/1067 (August 1, 1990).

⁹See Ciciora, W., Sgrignoli, G., and Thomas, W., A Tutorial on Ghost Canceling in Television Systems, IEEE Transactions on Consumer Electronics, Vol. CE-25 at 9-44 (February, 1979). See also Miyazawa, H., Matsuura, S., Takayama, S. and Masao, U., Development of a Ghost Cancel Reference Signal for TV Broadcasting, IEEE Transactions on Broadcasting, Volume 35, No. 4 at 339-347 (December, 1989).

ATSC has worked extensively on ghost canceling since July, 1989. Through June, 1992, ATSC held nineteen meetings of its specialist group on ghost canceling ("T3/S5"), three subsequent meetings of a special task force on ghost canceling, and conducted computer simulations, cable system field tests, and two sets of laboratory and over-the-air field tests.¹⁰ ATSC also performed compatibility tests to insure that the presence of GCR signals in the VBI does not cause any adverse reaction to the existing receiver population.¹¹ There is no longer any doubt that ghost canceling technology is available and can be implemented quickly once a single location in the vertical blanking interval is found for the GCR signal.

On August 13, 1992, the ATSC completed a letter ballot vote of the ATSC membership and thereby established an ATSC voluntary technical standard for a GCR

¹⁰See Report of T3/S5 (ATSC Specialist Group on Ghost Canceling), ATSC Document No. T3/188 (March 20, 1992) (hereinafter, T3/S5 Report). See also PBS VBI Tests, supra n.6; Cable Television Laboratories, Inc., Phase II Laboratory Tests of NTSC Ghost Cancelers, ATSC Document No. T3/205 (June 16, 1992); and NAB/MSTV, Laboratory and Field Tests of Philips, Sarnoff/Thomson and Hybrid Philips/Sarnoff/Thomson Ghost Canceling Systems for NTSC Television Broadcasting, ATSC Document No. T3/204 (June 18, 1992).

¹¹GCR compatibility tests were performed under the auspices of the Electronic Industries Association (EIA) "to ascertain if the presence of the GCR signals in broadcast transmissions caused any degradation to television reception on existing television receivers." Receivers with closed captioning decoders were included in these tests. EIA concluded:

"No effects to off-air reception or to closed captioning information, attributable to GCR signal insertion, were observed on the television receivers. . . ."

GCR Compatibility with Existing Equipment, Appendix I to NAB/MSTV Results of Field Test of Ghost Canceling Systems (January 31, 1992) at 36.

signal.¹² All of those voting approved the proposed systems.¹³ The selection of one system for GCR signal standardization culminated a long process of testing and intensive technical discussion that at one time considered five different proposals for ghost canceling systems. Having completed this three-year standardization process, the ATSC GCR signal standard has a great deal of support among ATSC members. Still, ATSC believes that FCC action is necessary to enable widespread and low-cost availability of ghost canceling service to American viewers. The ATSC urges the FCC to encourage standardized implementation of the ATSC GCR signal by amending Section 73.682(a)(21)(iv) of its Rules to restrict transmissions on Line 19 of the vertical blanking interval to the ATSC GCR signal included herein as Attachment A. While use of the GCR Signal by broadcasters should be optional, FCC incorporation of the ATSC standard in the Commission's Rules will strongly encourage all industry segments to bring ghost canceling service to the American viewing public as soon as possible.

C. Line 19 Should Become Available for Transmission of the ATSC GCR Signal.

After carefully considering the various locations within the vertical blanking interval that might be appropriate to carry the GCR signal, the ATSC believes that use of Line 19 represents the optimal location for the GCR signal. For technical reasons, the location of the GCR signal must be in the vertical blanking interval of NTSC television station

¹²See Ghost Canceling Reference Signal for NTSC, ATSC Standard, Doc. A/49 (August 14, 1992), included here as Attachment A.

¹³ 38 ATSC Members voted in favor. 4 Members abstained. None voted against.

transmissions. Committing a specific line in the VBI to GCR signals (rather than, for example, a flexible placement) minimizes costs in the necessary receiver circuitry.¹⁴ Identification of a specific VBI line will also bolster the confidence of the television industry in ghost canceling technology and encourage local broadcasters to initiate this improvement as rapidly as possible. Because Line 19 has been protected by the Commission, it is the only line that today is passed unencumbered through the entire broadcast chain: transmitters, translators, CATV systems, MATV systems, and home recording systems. The use of Line 19 for ghost canceling is acceptable to broadcasters and will help lead to rapid introduction of an effective and inexpensive NTSC ghost canceling service.¹⁵

III. Conclusion.

For the reasons discussed above, we no longer believe the VIR transmission requirement contained in Section 73.682(a)(21)(iv) of the Commission's Rules should remain part of the FCC's rules. Instead, the implementation of the ATSC GCR signal should replace VIR signals on Line 19 and, as a result, enable a pronounced improvement in the reception of television broadcasts in the presence of multipath, ghosting, and other linear channel distortions that may exist between the television transmitter and television receiver. To help

¹⁴VBI space is used for a variety of functions by broadcast stations and cable system operators. These functions include teletext, closed-captioning for the hearing impaired, vertical interval test signals, many varieties of data transmissions, and additional test signals.

¹⁵The ATSC's views on the use of Line 19 are the result of a special task force on the use of the vertical blanking interval, T3/S5 Report, n.10, supra at 51, as approved by the ATSC Technology Group on Distribution (T3). See Meeting Minutes of the ATSC Technology Group on Distribution (T3), ATSC document No. T3/206 (June 25, 1992).

ensure that the benefits of ghost canceling technology are available to American viewers as soon as possible, ATSC urges the Commission to promptly begin a Rulemaking proceeding to permit the ATSC standard ghost canceling service to begin.

Respectfully submitted,

**United States Advanced
Television Systems Committee**
1776 K St., N.W., Suite 300
Washington, D.C. 20006


James C. McKinney
James C. McKinney
Chairman

August 14, 1992

CERTIFICATE OF SERVICE

I, Christy Kehlbeck, do hereby certify that a true and correct copy of the foregoing "Petition for Rule Making" was sent by first class mail, this August 14, 1992, to the following:

The Honorable Alfred C. Sikes
Chairman
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

The Honorable James H. Quello
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, D.C. 20554

The Honorable Sherrie P. Marshall
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 826
Washington, D.C. 20554

The Honorable Andrew C. Barrett
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, D.C. 20554

The Honorable Ervin S. Duggan
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 832
Washington, D.C. 20554

Mr. Roy J. Stewart
Chief, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W.
Room 314
Washington, D.C. 20554

Mr. Thomas P. Stanley
Chief Engineer
Office of Engineering and Technology
Federal Communication Commission
2025 M Street, N.W.
Room 7002
Washington, DC 20554

Mr. Gordon W. Godfrey
Acting Chief, Engineering
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 8112
Washington, DC 20554

Mr. William Hassinger
Assistant Chief, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W.
Room 314
Washington, D.C. 20554

Christy Kehlbeck
Christy Kehlbeck

United States Advanced Television Systems Committee

ATSC Standard

GHOST CANCELING REFERENCE SIGNAL FOR NTSC

1. Scope

This document describes a ghost canceling reference (GCR) signal for NTSC television signals.

2. Specification of the GCR Signal

The GCR signal permits detection of ghosts from $-3 \mu\text{sec}$ to $+45 \mu\text{sec}$. The signal has a flat spectrum and high energy up to 4.1 MHz and has a very low level of energy beyond 4.3 MHz (Figure 1). The normalized GCR signal as a function of time is shown in Figure 2.

The GCR signal shall be placed on line 19* of the vertical blanking interval on a 30 IRE pedestal. The pedestal has a rising transition from 0 IRE to 30 IRE 9.5 μsec after the leading edge of horizontal sync (defined at the 50% point). The falling transition from 30 IRE to 0 IRE is 58.5 μsec after the leading edge of horizontal sync. Both transitions have a 4T transition curve.

The GCR signal has a time duration of 35.5 μsec (measured at 1% of the maximum value) and begins 12.0 μsec after the leading edge of horizontal sync. The first peak (positive or negative) is 16.7 μsec after the leading edge of horizontal sync. The GCR signal varies from -10 to +70 IRE (the pedestal is the average of these extreme values).

Waveforms of the GCR signal on the pedestal are shown in Figure 3 and Figure 4 and represent line A and line B, respectively. Line A and line B have the same 30 IRE pedestal but the GCR polarity is inverted from line A to line B. The line A and line B signals are contained in an 8-field sequence as follows:

field 1 - line A; field 2 - line B; field 3 - line A; field 4 - line B;
field 5 - line B; field 6 - line A; field 7 - line B; field 8 - line A.

Numerical values of the GCR signal as a function of time are given in Annex I. These values were calculated from (1).

$$f(t) = \frac{A}{2\pi} \left[\int_0^\Omega [\cos(b\omega^2) + j\sin(b\omega^2)] W(\omega) e^{j\omega t} d\omega + \int_{-\Omega}^0 [\cos(b\omega^2) - j\sin(b\omega^2)] W(\omega) e^{j\omega t} d\omega \right] \quad (1)$$

where $A = 9.0$, $b = 110.0$, and $\Omega = \frac{4.3}{7.16} \pi$ Rad. $W(\omega)$ is the window function (2).

$$W(\omega) = \int_{-\frac{\pi}{c}}^{\frac{\pi}{c}} \left[\left[\frac{1}{2} + \frac{1}{2} \cos(ct) \right] \left[\frac{1}{2\pi} \int_{-\Omega_1}^{\Omega_1} e^{j\gamma t} d\gamma \right] \right] e^{-j\omega t} dt \quad (2)$$

where $c = 2.8 \cdot 10^5 \pi$ Rad. and $\Omega_1 = \frac{4.15}{7.16} \pi$ Rad.

* Subject to reservation of line 19 by the FCC exclusively for the optional placement of the GCR signal.

NOTE: The user's attention is called to the possibility that compliance with this standard may require the use of an invention covered by patent rights. By publication of this standard, no position is taken with respect to the validity of this claim or of any patent rights in connection therewith. The patent holder has, however, filed a statement of willingness to grant a license under these rights on reasonable and nondiscriminatory terms and conditions to applicants desiring to obtain such a license. Details may be obtained from the publisher.

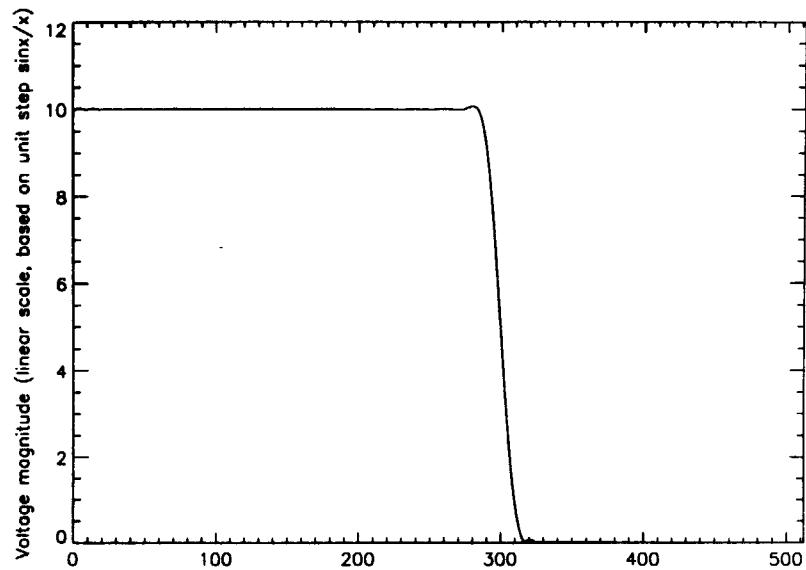


Figure 1. The Spectrum of the GCR Signal

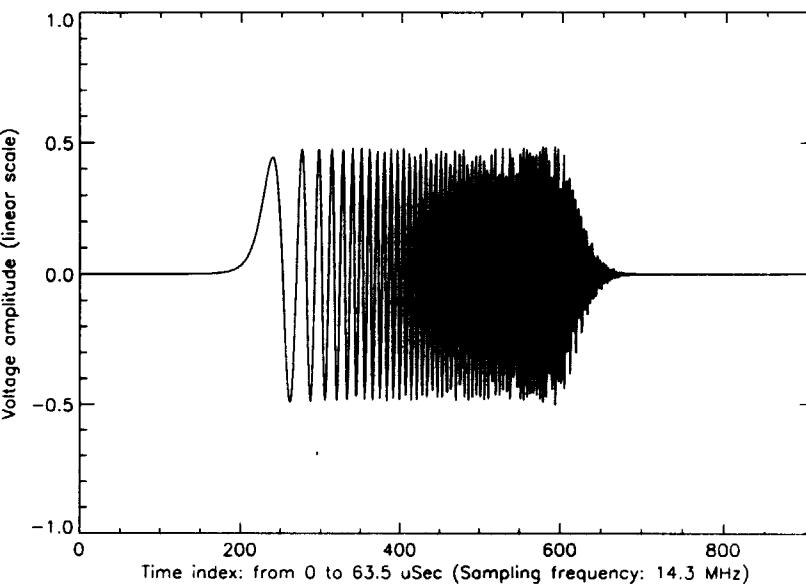


Figure 2. The Time Domain Normalized Waveform of the GCR Signal

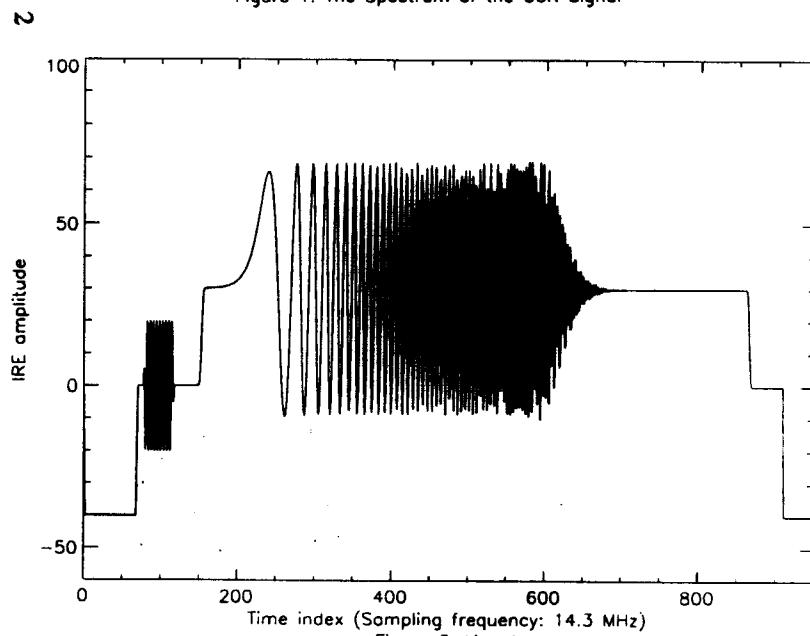


Figure 3. Line A

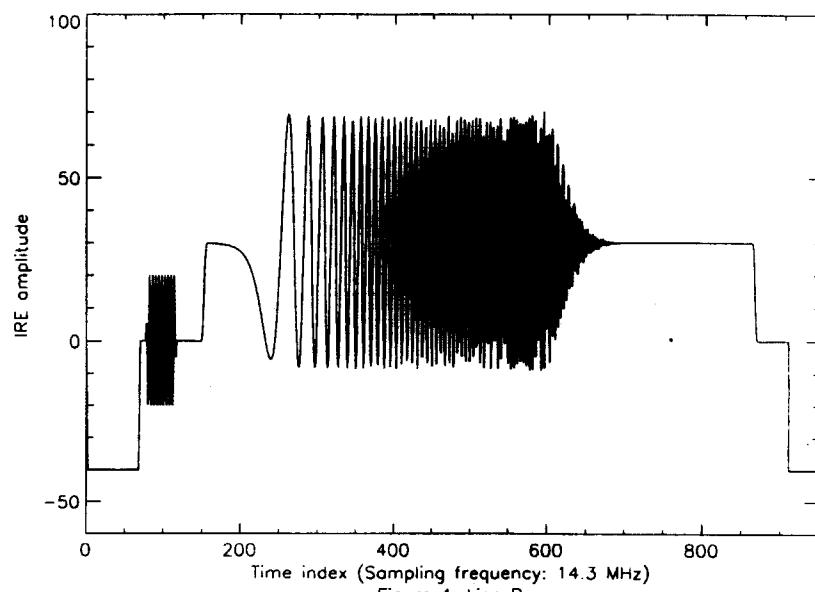


Figure 4. Line B

Membership
LIST
A T S C

Members

Ampex Corporation
AT&T
AT&T Bell Laboratories
Baylor University - Telecommunications
Bell Communications Research
Cable Television Laboratories
Capital Cities/ABC
CBS Broadcast Group
Comsat Video Enterprises, Inc.
David Sarnoff Research Center
Dolby Laboratories, Inc.
Eastman Kodak Company
EIDAK Corporation
Electronic Industries Association
Florida Atlantic University
Fox Inc.
General Instrument Corporation
GTE Telephone Operations
Hitachi America, Ltd.
Home Box Office
Ikegami Electronics USA, Inc.
Institute of Electrical and Electronics Engineers
INTV
Jansky/Barmat Telecommunications
Koichi Sadashige & Associates
Massachusetts Institute of Technology
Maximum Service Television
Mitsubishi Electric Sales America
Motion Picture Association of America
National Association of Broadcasters
National Broadcasting Company
National Cable Television Association
New York Institute of Technology
North American Philips
Panasonic Broadcast Systems Company
Panasonic Technologies, Inc.

Public Broadcasting Service
Sanyo Manufacturing Corporation
Scientific Atlanta
Sharp Electronics Corporation
Society of Motion Picture & TV Engineers
Sony Advanced Systems Company
Sony Corporation of America
Sony Pictures Studios
Tele-Communications, Inc.
Thomson Consumer Electronics
Toshiba America Consumer Products, Inc.
Tribune Broadcasting Company
Universal City Studios, Inc.
Viacom International Inc.
Visnews International, USA Ltd.
Westinghouse Broadcasting Company
Zenith Electronics Corporation

Observers

INTELSAT
Tomlinson Holman
Vivian Associates